

**BEFORE THE BOARD OF OIL, GAS AND MINING
DEPARTMENT OF NATURAL RESOURCES
STATE OF UTAH**

FILED

JUL 10 2012

SECRETARY, BOARD OF
OIL, GAS & MINING

IN THE MATTER OF THE REQUEST FOR
AGENCY ACTION OF PETROGLYPH OPERATING
CO., INC. AND III EXPLORATION 11LP FOR AN
ORDER VACATING THE ORDER ENTERED IN
CAUSE NO. 139-54 ESTABLISHING 320 ACRE
DRILLING AND SPACING UNITS IN THE UPPER
WASATCH FORMATIONS AS IT PERTAINS TO ALL
OF THE LANDS COVERED BY SAID ORDER WITH
THE EXCEPTION OF THE SE1/4 OF SECTION 9
WITHIN TOWNSHIP 4 SOUTH, RANGE 4 WEST,
USM AND TO MODIFY UTAH ADMIN. CODE
R649-3-2(1), R649-3-10 AND R649-3-11(1)
AND (2), FOR CERTAIN LANDS WITHIN
SECTIONS 7-10 AND 1-18 IN TOWNSHIP 4
SOUTH, RANGE 4 WEST, USM, DUCHESNE
COUNTY, UTAH

RESPONSE AND OBJECTION
NOTICE OF AGENCY ACTION
DOCKET NO. 2013-019
CAUSE NO. 139-107


RESPONSE AND OBJECTION TO NOTICE OF AGENCY ACTION

Tiger Energy Operating, Inc. and its affiliated company (Tiger) are the owner of well and leasehold interests in the area that is the subject of this matter. For Response and Objection, Tiger states

- 1) The Requested spacing is in appropriate for a number of reasons including the definition that the Top of the Wasatch Formation is at 7,414' in Lomax # 10-9 well. The data shows that such a suggestion is unclear. Top may be higher at 7,327' and needs clarification and support.
- 2) There is a lack of support and evidence that the base of the "Calcareous Shale Marker" is correlative throughout wells.
- 3) Geologic basis for the spacing outline is unclear. The geologic basis of proper spacing would not allow portions of sections 9, 10 and 15 be outside proposed 640 acre/16 well modifications. A spacing order covering this area providing for full section spacing is geologically appropriate.
- 4) The Proposal fails to discuss how the previous communitized (CA) and participating (PA) areas under the old 320 acre spacing should be handled?
- 5) This interested party did not receive adequate notice of the hearing. The Certificate of service did not include offset wellbore leaseholders such as Tiger.

Wherefore, Tiger states that proposal contains insufficient information to accept proposed spacing and Tiger requests the opportunity to participate in the hearing and provide information.

Tiger Energy Operating, Inc.



John D. Adamson – 5553762-2250 Professional Geologist
Company Geologist and Representative

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 10th day of July, 2013, that I served the attached RESPONSE and OBJECTION TO NOTICE OF AGENCY ACTION, on Assistant Attorney General, State of Utah, by placing a true and correct copy thereon in an envelope or email addressed to:

A John Davis
Mark L. Burghardt
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Petroglyph Operating co., Inc.
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Boise, ID 83707

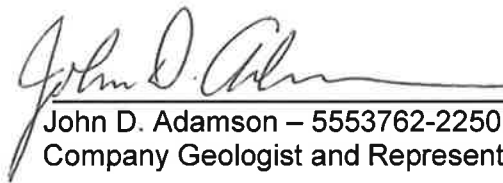
III Exploration II LP
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Boise, ID 83707

Ute Distribution Corporation
C/O Bureau of Indian Affairs
Uintah and Ouray Agency
PO Box 130
Ft. Duchesne, UT 84026

Ute Indian tribe of the Uintah and Ouray Reservation, Utah
C/O Bureau of Indian Affairs
Uintah and Ouray Agency
PO Box 130
Ft. Duchesne, UT 84026

Friar Oil Company
PO Box 276
Magna, UT 84044

E&P Energy E&P Company, L.P.
PO Box 301108
Dallas, TX 75303-1108

A handwritten signature in black ink, reading "John D. Adamson", written over a horizontal line.

John D. Adamson – 5553762-2250 Professional Geologist
Company Geologist and Representative